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Attorneys for ASPLUNDH CONSTRUCTION, LLC

**UNITED STATES BANKRUPTCY COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

PACIFIC GAS AND ELECTRIC  
COMPANY,

Debtors.

☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric Company  
☒ Affects both Debtors  
*\* All papers shall be filed in the Lead Case,  
No. 19-30088 (DM).*

Case No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**ASPLUNDH CONSTRUCTION, LLC'S  
STATEMENT OF NON-OPPOSITION  
RE REORGANIZED DEBTORS'  
NINETY-FOURTH OMNIBUS  
OBJECTION TO CLAIMS**

Date: July 28, 2021

Time: 10:00 a.m.

Place: (Telephonic Appearance Only)

450 Golden Gate Avenue

Courtroom 17, 16<sup>th</sup> Floor

San Francisco, CA 94102

Related Doc#: 10812

Asplundh Construction, LLC ("Asplundh") submits this statement of non-opposition in response to the Reorganized Debtors' Ninety-Fourth Omnibus Objection to Claims (Amended and Superseded Claims) [Doc# 10812] ("94<sup>th</sup> Omnibus Objection") as follows:

1 Asplundh does not object to disallowance of Asplundh's Claim #17001 in the amount of  
2 \$4,170,913.06, as set forth in the 94<sup>th</sup> Omnibus Objection, based upon the Debtors' representation  
3 that Asplundh's Claim #107056 in the amount of \$3,430,436.16, referred to by the Debtors as the  
4 "Surviving Claim," is in no way affected by the 94<sup>th</sup> Omnibus Objection.<sup>1</sup>

5  
6 Dated: July 8, 2021

**DUANE MORRIS LLP**

7 By: /s/ Geoffrey A. Heaton (206990)

8 GEOFFREY A. HEATON  
9 Attorneys for ASPLUNDH  
10 CONSTRUCTION, LLC  
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28 <sup>1</sup> Claim No. 107056 has been paid.